



## Final Regulation Agency Background Document

<b>Agency name</b>	Board (Department) of Education
<b>Virginia Administrative Code (VAC) citation</b>	8 VAC 20-160
<b>Regulation title</b>	Regulations Governing Secondary School Transcript
<b>Action title</b>	Revision of information requirements for secondary school transcripts and profile data sheets.
<b>Date this document prepared</b>	March 29, 2007

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Orders 21 (2002) and 58 (1999), and the *Virginia Register Form, Style, and Procedure Manual*.

### Brief summary

*Please provide a brief summary (no more than 2 short paragraphs) of the proposed new regulation, proposed amendments to the existing regulation, or the regulation proposed to be repealed. Alert the reader to all substantive matters or changes. If applicable, generally describe the existing regulation. Also, please include a brief description of changes to the regulation from publication of the proposed regulation to the final regulation.*

The *Regulations Governing Secondary School Transcript* provide definitions, format options for transcripts and profile data sheets, and the elements for weighting courses. The purpose of these proposed revisions is to revise the definitions as necessary to comport with those in other Board of Education regulations, and revise the format options for the transcript and profile data sheets to reflect both Board of Education regulations and state law. The sections concerning class ranking, AP courses, industry certification, diploma types, and the elements of weighting have been revised to ensure that they comport with best instructional practices, as well as other state requirements.

## Statement of final agency action

*Please provide a statement of the final action taken by the agency including (1) the date the action was taken, (2) the name of the agency taking the action, and (3) the title of the regulation.*

During the March 29, 2007 meeting of the Virginia Board of Education, the Board adopted the proposed revisions to the *Regulations Governing Secondary School Transcript* (8 VAC 20-160-10 et seq.) and directed the Department of Education to proceed with the final stages of the administrative process.

## Legal basis

*Please identify the state and/or federal legal authority to promulgate this proposed regulation, including (1) the most relevant law and/or regulation, including Code of Virginia citation and General Assembly chapter numbers, if applicable, and (2) promulgating entity, i.e., agency, board, or person. Describe the legal authority and the extent to which the authority is mandatory or discretionary.*

Section 22.1-16 of the *Code of Virginia* vests the Board of Education with the authority to adopt bylaws for its own government and promulgate such regulations as may be necessary to carry out its powers and duties and the provisions of Title 22.1.

## Purpose

*Please explain the need for the new or amended regulation. Describe the rationale or justification of the proposed regulatory action. Detail the specific reasons it is essential to protect the health, safety or welfare of citizens. Discuss the goals of the proposal and the problems the proposal is intended to solve.*

This action is essential to protect the welfare of the Commonwealth's school-age population. The goals of the proposed revisions are to strengthen the transcript regulations and to bring the regulations into conformity with amended or new state and federal laws as well as the needs of higher education. The revised regulations provide definitions, format options for transcripts and profile data sheets, and the elements for weighting courses.

## Substance

*Please identify and explain the new substantive provisions, the substantive changes to existing sections, or both where appropriate. A more detailed discussion is required under the "All changes made in this regulatory action" section.*

The following changes proposed to the secondary school transcript regulations are:

1. Changes to the definitions section to ensure that terms are defined in the same manner as other Board regulations;
2. Changes to the effective date section of the regulations;
3. Revisions to the requirements to ensure that school divisions include type of diploma and career and technical industry certifications on the student's secondary school transcript;

4. Revisions to the requirements to ensure that the different types of diplomas are reflected, but that the inclusion of the information does not violate the Family Educational Rights and Privacy Act;
5. Changes to the requirement regarding a student’s rank in class to reflect whether the school or program chooses to rank students;
6. Changes to the sections concerning advanced-level courses and the elements of weighting courses; and
7. Changes from a local student identification number to a state student testing identifier so that data can be collected and analyzed on students from grades PK-12.

**Issues**

*Please identify the issues associated with the proposed regulatory action, including:*

- 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions;
- 2) the primary advantages and disadvantages to the agency or the Commonwealth; and
- 3) other pertinent matters of interest to the regulated community, government officials, and the public.

*If there are no disadvantages to the public or the Commonwealth, please indicate.*

The benefits will likely exceed the costs for all proposed changes. The proposed changes to the definitions sections to ensure that terms are defined in the same manner as other Board regulations is beneficial in that localities and the public will be less likely to be confused by similar terms being used to indicate different concepts. The proposed revisions to the requirements to ensure that school divisions include type of diploma and career and technical industry certifications on the student’s secondary school transcript will allow students who earn an Advanced Studies Diploma or an industry certification to be recognized. The use of a state student testing identifier will eliminate confusion as students transfer from one school and division to another.

The changes are necessary to align the transcript requirements with the needs of the education system in documenting student performance. The proposed regulatory action includes revisions that better define the requirements of the secondary school transcript with the needs of students, school divisions, and institutions of higher education. In addition, the revisions will allow for the future development of the secondary school transcripts in a digital data exchange format for electronic transcript transmission.

The proposed revisions are advantageous to the public, the agency, higher education institutions, and the Commonwealth at large. There are no disadvantages.

**Changes made since the proposed stage**

*Please describe all changes made to the text of the proposed regulation since the publication of the proposed stage. For the Registrar’s office, please put an asterisk next to any substantive changes.*

Section number	Requirement at proposed stage	What has changed	Rationale for change
8 VAC 20-160- 10		The amended language states: <u>“Commonwealth Scholar” means a student who completes all of the requirements for at least a Standard Diploma and additional prescribed rigorous coursework in foreign language, history, mathematics,</u>	To define a new term used in the regulations.

		<u>science, and other approved discipline areas consistent with the United States Department of Education’s State Scholars Initiative.”</u>	
8 VAC 20-160-10		The amended language states: <u>“Early College Scholar” means a student who signs the Early College Scholars agreement and completes the requirements of the program, which includes a prescribed number of potentially transferable college credits, maintaining a “B” average or better, and earning an Advanced Studies diploma.”</u>	To define a new term used in the regulations.
8 VAC 20-160-10	The proposed language states: <u>“Secondary course” means a high school-level course of study that awards high school credits to meet graduation requirements. In addition to providing content and knowledge, secondary courses encourage students to develop higher level thinking skills such as problem solving, critical analyses and syntheses of ideas. Students are encouraged to understand, appreciate, and formulate ideas related to scientific, technical and social concepts.</u>	The amended language states: <u>“Secondary course” means a high school-level course of study that awards high school credits <del>to meet graduation requirements.</del> In addition to providing content and knowledge, secondary courses encourage students to develop higher level thinking skills such as problem solving, critical analyses and syntheses of ideas. Students are encouraged to understand, appreciate, and formulate ideas related to scientific, technical and social concepts.</u>	To remove potentially ambiguous and unnecessary language.
8 VAC 20-160-20	The proposed language states: <u>“The secondary school transcript regulations shall become effective for students who take secondary courses for credit beginning in 2007-2008.”</u>	The amended language states: <u>“The secondary school transcript regulations shall become effective for students who take secondary courses for credit beginning in <del>2007-2008</del> 2008-2009.”</u>	To give school divisions additional time to make changes to their transcripts and electronic systems to comply with the regulations.
8 VAC 20-160-30	The proposed language states: <u>“Localities have options for the secondary school transcript format. They may use the Department of</u>	The amended language states: <u>“Localities have options for the secondary school transcript format. They may use the Department of Education model or develop their own following board regulations.</u>	To clarify the use of the electronic transcript transmission.

	Education model or develop their own following board regulations. Localities may also use a digital data exchange format for electronic transcript transmission at such time as one is adopted by the Department of Education. The accreditation status of a high school shall not be included on the student transcript provided to colleges, universities, or employers.”	Localities may also use a digital data exchange format for electronic transcript transmission, <del>at such time as one is adopted by the Department of Education.</del> The accreditation status of a high school shall not be included on the student transcript provided to colleges, universities, or employers.”	
8 VAC 20-160-30		The amended language states: <u>“13. Notation of Commonwealth Scholar Designation;”</u>	To update language to align with current practices.
8 VAC 20-160-30		The amended language renumbers items 13-31 to 14-32.	To realign numbering sequence.
8 VAC 20-160-30	The proposed language states “14. Name, address, and telephone number of schools student attended each year;”	The amended language states: <u>“14. Name, address, e-mail address, and telephone number of schools student attended each year;”</u>	To provide additional school contact information.
8 VAC 20-160-30	The proposed language states: “17. A list of verified credits earned;”	The amended language states: <u>“18. A list of verified credits earned, including any credits earned by substitution;”</u>	To align the transcript regulations with options provided in the 2006 Standards of Accreditation revision.
8 VAC 20-160-30	The proposed language states: “21. Key to symbols and abbreviations used to denote accelerated, advanced-level courses, Commonwealth College Course Collaborative courses, honors courses, and summer school courses;”	The amended language states: <u>“22. Key to symbols and abbreviations used to denote accelerated, advanced-level courses, Commonwealth College Course Collaborative courses, honors courses, and summer school courses, or credits earned by substitution;”</u>	To align the transcript regulations with options provided in the 2006 Standards of Accreditation revision.
8 VAC 20-160-30	The proposed language states: “24. Test record, to include highest score earned on college performance-related standardized tests such as SAT and ACT, excluding Standards of Learning (SOL) test	The amended language states: <u>“25. Test record, to include at least the highest score earned, if available, on college performance-related standardized tests such as SAT and ACT, excluding Standards of Learning (SOL) test scores;”</u>	To clarify that the transcript must include the highest college performance-related standardized test scores available to the school.

	scores;”		
8 VAC 20-160-40	The proposed language states: “A secondary school profile data sheet for each school reflected on the transcript shall be attached to each student transcript sent to colleges, universities, and prospective employers.”	The amended language states: ”A secondary school profile data sheet for each school reflected on the transcript, <u>if available</u> , shall be attached to each student transcript sent to colleges, universities, and prospective employers.”	To clarify that the profile data sheets from other high schools a student has attended should be included when sending transcripts but acknowledges that they may not be available.

**Public comment**

*Please summarize all comments received during the public comment period following the publication of the proposed stage, and provide the agency response. If no comment was received, please so indicate.*

<b>Commenter</b>	<b>Comment</b>	<b>Agency response</b>
Gabriele Beyer Chesterfield County	Impact on resources. Projected that the cost of making the changes to the transcript in this division may cost between \$4,500 - \$9,000.	Any change to transcripts will have an impact on resources.
Mark Crockett Albemarle County	Questions “weighting” Advanced Placement (AP) coursework. The commenter cited (and included) research that questions the predictive validity and contributions of AP coursework to students’ success in college.	Advanced Placement classes are weighted because they offer a more challenging curriculum equivalent to college-level coursework.
Betty Dotson Dickenson County	Impact on resources. Small divisions will be significantly impacted from lack of money and resources. Changes must be made manually.	Any change to transcripts will have an impact on resources.
Cheryl Hiatt Prince William County	Asks for interpretation. Requested an interpretation of “highest score earned” when sending transcripts (8 VAC 20-160-30)	Revision modified to say “at least the highest score earned, if available,…”
Betty Hornick Chesterfield County	To attach a profile data sheet from all schools a student attended to transcripts will be time consuming and difficult. (8 VAC 20-160-40)	Revision to wording to say “for each school reflected on the transcript, if available,…”
Penny Petersen Hampton City	To include only highest SAT/ACT scores is not feasible. Questions whether the scores should be included at all. (8 VAC 20-160-40)	Revision modified to say “at least the highest score earned, if available,…”

**All changes made in this regulatory action**

*Please detail all changes that are being proposed and the consequences of the proposed changes. Detail new provisions and/or all changes to existing sections.*

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
8 VAC 20-160-10		“Advanced course” means a course that presents material and concepts beyond the introductory or the elementary; a course that carries on from an introductory or elementary course given in the same school.	Delete that statement.  Rationale: Updates language with other definitions.
8 VAC 20-160-10			“Advanced-level courses/programs” means those academic, career/technical, fine and performing arts, or interdisciplinary high school courses/programs that enable students to acquire and master advanced knowledge. Such courses may be suitable for weighted credit in order to encourage students to take these courses and to be rewarded for the extra endeavor and academic performance these courses/programs require.  Rationale: Clarifies language to comport with effective practices.
8 VAC 20-160-10		“Advanced placement (AP) course” means a course with a syllabus equivalent to the relevant advanced placement syllabus disseminated by the Educational Testing Service.	“Advanced Placement (AP) course” means an advanced-level course with a syllabus equivalent to the relevant Advanced Placement syllabus disseminated by The College Board.  Rationale: Clarifies language consistent with predominant practices.
8 VAC 20-160-10			“Certificate of Program Completion award date” means the date when a certificate of program completion is awarded. A Certificate of Program Completion is not to be included as a diploma option.  Rationale: Clarifies language to comport with current practices.
8 VAC 20-160-10			“Commonwealth College Course Collaborative (CCCC)” means a set of approved courses taken in high school that fully transfer as core requirements and degree credits at Virginia colleges and universities.

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
			<p>Rationale: Clarifies language to comport with current practices.</p>
8 VAC 20-160-10			<p><u>“Commonwealth Scholar” means a student who completes all of the requirements for at least a Standard Diploma and additional prescribed rigorous coursework in foreign language, history, mathematics, science, and other approved discipline areas consistent with the United States Department of Education’s State Scholars Initiative.</u></p>
8 VAC 20-160-10			<p>“Credit summary” means the number of courses successfully completed in each discipline as required for graduation.</p> <p>Rationale: Clarifies language to comport with current practices.</p>
8 VAC 20-160-10			<p>“Dual enrollment course” means a course that carries both high school and college credit.</p> <p>Rationale: Clarifies language to comport with current practices.</p>
8 VAC 20-160-10			<p><u>“Early College Scholar” means a student who signs the Early College Scholars agreement and completes the requirements of the program, which includes a prescribed number of potentially transferable college credits, maintaining a “B” average or better, and earning an Advanced Studies diploma.</u></p>
8 VAC 20-160-10		<p>“Grade point average” means a measure of average scholastic success in all school subjects taken by a student during a certain term or semester, or accumulated for several terms or semesters; obtained by dividing grade points by hours of coursework taken.</p>	<p>“Grade point average” means a measure of average scholastic success in all high school credit-bearing courses taken by a student during a certain term or semester, or accumulated for several terms or semesters; obtained by dividing grade points by number of courses taken.</p> <p>Rationale: Clarifies language to be consistent with predominant practices.</p>
8 VAC 20-160-10			<p>“Graduation date” means the date when diploma requirements have been met and a diploma is awarded.</p> <p>Rationale: Clarifies language.</p>

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
8 VAC 20-160-10		<p>“Honors course” means a course at the high school level, that limits enrollment to exceptionally capable students; provides for independent or tutorial work, places the responsibility for student progress more on the student than on the teachers, emphasizes reading and self-instruction.</p>	<p>“Honors course” means a course offered to academically advanced students to provide opportunities to study and learn with other advanced students and to accelerate their learning in a specific content area. These courses are designed to be more challenging by covering additional topics or some topics in greater depth.</p> <p>Rationale: Updates language to align with current practices.</p>
8 VAC 20-160-10			<p>“Industry certification credential” means a career and technical education credential that is earned by successfully completing a Board of Education-approved industry certification examination, a state-issued professional license, or an occupational competency examination.</p> <p>Rationale: Updates language to align with current practices.</p>
8 VAC 20-160-10			<p>“International Baccalaureate (IB) course” means an advanced-level course with a syllabus approved by the International Baccalaureate Organization (IBO) and meeting the criteria offered through the IBO program.</p> <p>Rationale: Clarifies language that comports with current practices.</p>
8 VAC 20-160-10		<p>“Secondary course” means a course of study planned especially for people of ages approximately 12 to 17, in which the emphasis tends to shift from master of basic tools of learning, expression, and understanding to the use and extension of the tools in exploring areas of thought and living, and in exploring and acquiring information, concepts, intellectual skills, attitudes, social, physical, and intellectual ideas, and</p>	<p>“Secondary course” means a high school-level course of study that awards high school credits, <del>to meet graduation requirements.</del> In addition to providing content and knowledge, secondary courses encourage students to develop higher level thinking skills such as problem solving, critical analyses and syntheses of ideas. Students are encouraged to understand, appreciate, and formulate ideas related to scientific, technical and social concepts.</p> <p>Rationale: Updates language to align with current practices.</p>

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
		habits, understanding, and appreciation.	
8 VAC 20-160-10		“Secondary school profile data” means information given in a summary format of a particular secondary school, such as location; description; achievement data; definition of curriculum; grading scale; grade distribution; weighted grades; rank in class, graduation requirements, and explanation of advanced, accelerated, advanced placement, honors courses.	<p>“Secondary school profile data” means information given in a summary format of a particular secondary school, such as location; description; achievement data; definition of curriculum; grading scale; grade distribution; weighted grades; rank in class, if a ranking procedure is used; graduation requirements; and an explanation of advanced-level, accelerated, and honors courses, industry certifications, and other specialized programs.</p> <p>Rationale: Updates language to align with current practices.</p>
8 VAC 20-160-10		“Weighted course” means advanced placement, advanced or honors level courses in which credit is increased usually by reason of quality of work accomplished.	<p>“Weighted course” means an advanced-level course in which credit is increased as determined by local school board policies and defined on the school profile.</p> <p>Rationale: Updates language to align with current practices.</p>
8 VAC 20-160-20		The secondary school transcript regulations shall become effective with seventh grade students who take secondary courses for credit beginning in the 1988-89 school year.	<p>The secondary school transcript regulations shall become effective for students who take secondary courses for credit beginning in <del>2007-2008</del> <u>2008-2009</u>.</p> <p>Rationale: Updates information to align with current practices. Allows school division a longer phase-in time.</p>
8 VAC 20-160-30		Localities have two options for the secondary school transcript format. They may use the Department of Education model or develop their own following board regulations. Transcripts developed locally shall be approved by the Department of Education. No standard format is required. The accreditation status of a high school shall not be included on the student transcript provided to colleges, universities, or employers.	<p>Localities have options for the secondary school transcript format. They may use the Department of Education model or develop their own following board regulations. Localities may also use a digital data exchange format for electronic transcript transmission, <del>at such time as one is adopted by the Department of Education.</del> The accreditation status of a high school shall not be included on the student transcript provided to colleges, universities, or employers.</p> <p>Rationale: Updates information to align with current technology.</p>
8 VAC		3. Student number;	3. State Testing Identifier (STI);

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
20-160-30			Rationale: Updates information to align with current technology.
8 VAC 20-160-30		5. Sex;	5. Gender;  Rationale: Updates language to comport with predominant practices.
8 VAC 20-160-30		9. Type of diploma, to include “Advanced Studies” or “Other Diplomas Authorized by the Board of Education”;	9. Type of diploma, to include “Advanced Studies,” “Standard,” or “Other Diplomas Authorized by the Board of Education;”  Rationale: Updates information to align with current practices.
8 VAC 20-160-30			10. Type of industry certification credential and date of completion, if applicable;  Rationale: Updates language to comport with predominant practices.
8 VAC 20-160-30			11. Certificate of Program Completion and award date, if applicable;  Rationale: Updates language to comport with predominant practices.
8 VAC 20-160-30			12. Notation of Early College Scholar Designation;  Rationale: Updates language to comport with predominant practices.
8 VAC 20-160-30			13. <u>Notation of Commonwealth Scholar Designation</u> ;  Rationale: Updates language to comport with current practices. Updates number sequencing.
8 VAC 20-160-30		10. Name of schools student attended each year;	<del>4</del> 14. Name, address, <u>e-mail address</u> , and telephone number of schools student attended each year;  Rationale: Updates language. Updates number sequencing.
8 VAC 20-160-30		11. Number of days absent within given school year;	<del>44</del> 15. Number of days absent within given school year;

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
8 VAC 20-160-30		12. Course work listed by year with grades;	<p><del>45</del><u>16</u>. Course work listed by year with grades;</p> <p>Rationale: Updates number sequencing.</p>
8 VAC 20-160-30		13. Total credits earned by year;	<p><del>46</del><u>17</u>. Total credits earned by year;</p> <p>Rationale: Updates number sequencing.</p>
8 VAC 20-160-30		14. Total verified credits earned;	<p><del>47</del><u>18</u>. A list of verified credits earned, <u>including any credits earned by substitution</u>;</p> <p>Rationale: Clarifies language and aligns the transcript regulations with recent additions to the Standards of Accreditation. Updates number sequencing.</p>
8 VAC 20-160-30		15. Credits to date;	<p><del>48</del><u>19</u>. Credits to date;</p> <p>Rationale: Updates number sequencing.</p>
8 VAC 20-160-30		16. Grade point average;	<p><del>49</del><u>20</u>. Grade point average;</p> <p>Rationale: Updates number sequencing.</p>
8 VAC 20-160-30		17. Credit summary for entire school experience;	<p><del>20</del><u>21</u>. Credit summary for entire school experience;</p> <p>Rationale: Updates number sequencing.</p>
8 VAC 20-160-30		18. Key to symbols and abbreviations used to denote accelerated, advanced, advanced placement, honors, and summer school courses;	<p><del>24</del><u>22</u>. Key to symbols and abbreviations used to denote accelerated, advanced-level courses, Commonwealth College Course Collaborative courses, honors courses, and summer school courses, <u>or credits earned by substitution</u>;</p> <p>Rationale: Updates language to comport with predominant practices and aligns the transcript regulations with options provided in the 2006 Standards of Accreditation revision. Updates number sequencing.</p>
8 VAC 20-160-30		19. Rank in class with given number of semesters used for computation;	<p><del>22</del><u>23</u>. Notification of whether school/program ranks students; if so, the rank in class with given number of semesters used for computation;</p> <p>Rationale: Clarifies language to comport with predominant practices. Updates number</p>

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
			sequencing.
8 VAC 20-160-30		20. Final driver education grade;	<del>23</del> <u>24</u> . Final driver education grade;  Rationale: Updates number sequencing.
8 VAC 20-160-30		21. Test record, to include results on college performance-related standardized tests such as College Entrance Examination Board or equivalent, excluding Standards of Learning (SOL) test scores;	<del>24</del> <u>25</u> . Test record, to include at least the highest score earned, if available, on college performance-related standardized tests such as SAT and ACT, excluding Standards of Learning (SOL) test scores;  Rationale: Clarifies language to comport with predominant practices. Updates number sequencing.
8 VAC 20-160-30		22. Signature and title of school official;	<del>25</del> <u>26</u> . Signature and title of school official;  Rationale: Updates number sequencing.
8 VAC 20-160-30		23. Date of school official signature;	<del>26</del> <u>27</u> . Date of school official signature;  Rationale: Updates number sequencing.
8 VAC 20-160-30		24. School name;	<del>27</del> <u>28</u> . School name;  Rationale: Updates number sequencing.
8 VAC 20-160-30			<del>28</del> <u>29</u> . School address;  Rationale: Updates language to comport with predominant practices. Updates number sequencing.
8 VAC 20-160-30		25. Telephone number of school;	<del>29</del> <u>30</u> . Telephone number of school;  Rationale: Updates number sequencing.
8 VAC 20-160-30			<del>30</del> <u>31</u> . Fax number of school;  Rationale: Updates language to comport with predominant practices. Updates number sequencing.
8 VAC 20-160-30		26. Department of Education code number.	<del>31</del> <u>32</u> . The school's Department of Education 7-digit code number.  Rationale: Clarifies language. Updates number sequencing.
8 VAC		A secondary school profile	A secondary school profile data sheet for

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
20-160-40		data sheet that includes the required information shall be attached to each student transcript sent to colleges, universities, and prospective employers. Schools may furnish additional information. The accreditation status of a high school shall not be included on the school profile data sheet. No standard format is required. The required information is as follows:	each school reflected on the transcript, <u>if available</u> , shall be attached to each student transcript sent to colleges, universities, and prospective employers. Schools may furnish additional information. The accreditation status of a high school shall not be included on the school profile data sheet. No standard format is required. The profile data sheet must contain the following information:  Rationale: Updates and clarifies language to comport with predominant practices.
8 VAC 20-160-40		1. Name of guidance director or counselor;	1. Name of school counseling director or school counselor;  Rationale: Updates language to comport with predominant practices.
8 VAC 20-160-40		4. Achievement data to include College Entrance Examination Board/Scholastic Aptitude test code, mean Scholastic Aptitude Test score for the graduating class, average Scholastic Aptitude Test/American College Test scores for the school in comparison with Virginia and nation;	4. Achievement data to include SAT and/or ACT scores using the most recent data available in comparison with Virginia and the nation.  Rationale: Updates language to comport with predominant practices.
8 VAC 20-160-40		5. Definition of curriculum;	5. Description of curriculum;  Rationale: Updates language to comport with predominant practices.
8 VAC 20-160-40		8. Explanation of advanced placement, advanced, accelerated, and honors courses;	8. Explanation of advanced-level, accelerated, and honors courses;  Rationale: Clarifies language.
8 VAC 20-160-40		10. Rank in class:	10. Explanation of rank in class, if applicable:  Rationale: Updates language to comport with predominant practices.
8 VAC 20-160-50		AP courses.	Weight of advanced-level courses.  Rationale: Updates and clarifies language to comport with predominant practices.

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change and rationale
8 VAC 20-160-50		All advanced placement (AP) courses shall be weighted for computing the student's grade point average.	Advanced Placement (AP) and International Baccalaureate (IB) courses shall be weighted. Local school boards shall determine which other courses/programs are to receive weighted credits, the amount of weight such courses shall receive, and how those weighted credits will be used in the determination of grade point averages in the school or school division.  Rationale: Updates language to comport with predominant practices.
8 VAC 20-160-60		Advanced, accelerated, advanced placement, and honors level courses to be weighted shall have the following elements:	If the course is to be weighted, it must have the following elements:  Rationale: Updates language to comport with predominant practices.
8 VAC 20-160-60		1. Defined curriculum	1. Specified curriculum approved by local board or outside agency meeting criteria of program and/or organization;  Rationale: Updates and clarifies language.

**Regulatory flexibility analysis**

*Please describe the agency's analysis of alternative regulatory methods, consistent with health, safety, environmental, and economic welfare, that will accomplish the objectives of applicable law while minimizing the adverse impact on small business. Alternative regulatory methods include, at a minimum: 1) the establishment of less stringent compliance or reporting requirements; 2) the establishment of less stringent schedules or deadlines for compliance or reporting requirements; 3) the consolidation or simplification of compliance or reporting requirements; 4) the establishment of performance standards for small businesses to replace design or operational standards required in the proposed regulation; and 5) the exemption of small businesses from all or any part of the requirements contained in the proposed regulation.*

The Department of Education has determined that there are no other regulatory methods. The *Code of Virginia* requires these regulations.

**Family impact**

*Please assess the impact of the proposed regulatory action on the institution of the family and family stability including to what extent the regulatory action will: 1) strengthen or erode the authority and rights of parents in the education, nurturing, and supervision of their children; 2) encourage or discourage economic self-sufficiency, self-pride, and the assumption of responsibility for oneself, one's spouse, and*

*one's children and/or elderly parents; 3) strengthen or erode the marital commitment; and 4) increase or decrease disposable family income.*

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The change in transcript regulations will have no impact on the institution of the family and family stability.